a user communication interface for communicating with users via a telecommunications network;

a processor;

an application-processing module executable by the processor to process voice command applications, the voice command applications defining allowed grammars and application logic;

a voice-processing module executable by the processor to recognize grammars in speech signals received from a user via the user communication interface; and

aliasing-logic executable by the processor, upon recognition of an alias grammar in a speech signal received from the user, to convert the alias grammar to an actual grammar, and to recognize the actual grammar as an allowed grammar defined by a voice command application;

wherein the aliasing-logic uses a predefined set of correlations between alias grammars and actual grammars to convert between an alias grammar and an actual grammar; and wherein the processor uses at least a subset of the predefined set of correlations regardless of the user who is communicating with the voice command system and substantially regardless of which voice command application the processor is processing.

The subject matter of claim 3 is described in the specification, at, among other places, page 26 line 22 et seq. Basically, with this invention, upon recognition of an alias grammar in a speech signal received from the user, the voice command system converts the alias grammar (e..g., « tomorrow's outlooks ») to an actual grammar (« extended forecast »), and recognizes the actual grammar as an allowed grammar defined by a voice command application. Additionally, the processor uses a predefined set of these correlations of alias grammar to actual grammar substantially regardless of which voice command application the processor is processing. For example, with the invention of claim 3, a processor can execute a plurality of different voice command applications, and the invention of claim 3 allows the predefined aliases for grammar that are global, or common, across a plurality of different voice command applications and thus independent of the context in which they arise.

The Examiner has recognized that this feature is not taught in Alshawi, and looks to Cohen for the teaching of this subject matter, and in particular paragraph 25 thereof. Applicants respectfully submit that paragraph 25 of Cohen does not in fact teach a processor using a correlation between alias grammar and actual grammars that are used (1) regardless of the user who is communicating with the voice command system and (2) substantially regardless of which voice command application the processor is processing (i.e., used accross multiple voice command applications) as claimed in the last paragraph of claim 3. Accordingly, even if Cohen were to be combined with Alshawi, the result is not the invention of claim 3.

What Cohen actually mentions at paragraph 25 is that the browser controller of Cohen includes a number of "dynamic grammars" which are modified according to the needs of each user. As such the dynamic grammars are not used substantially regardless of the user the system is communicating with, as they are "modified according to the needs of each particular user." Cohen, page 3, left hand column, ¶25, 6-7 lines from the bottom, emphasis added. Moreover, as explained further in Cohen at Table 1 and column 39, the "dynamic grammars" are not in fact alias grammars for actual grammars (as those terms are understood in the present application) that are constant across applications. Instead, they are specific functions that are assigned by the user and can change – like bookmarks, telephone numbers, and preferences. See Table 1.

As explained at paragraph 41 of Cohen, there may also be a set of dynamic grammars that are active on each voice page 118. As explained at paragraph 42: "There are dynamic grammars in the voice page because certain items may change periodically. For example, on a news voice page it is recognized that the news changes continually.

The news reports will contain audio links to other voice pates, telephone numbers or audio information servicesand the like which correspond to the news reports. Thus, these links will necessarily be dynamic grammar links." Here, Cohen is NOT teaching the use of an alias grammar for an actual grammar. Nor is Cohen teaching or suggesting any such alias grammar that is standard across multiple applications. Rather, Cohen is describing dynamic (changing) grammars in the form of dynamic links that can change for each different voice page (which is analogous to each different voice command application).

Moreover, Alshawi's disclosure of "variants" for grammars are specifically context related, and there is nothing in Cohen that would motivate one skilled in the art to have Alshawi's variants that are independent of both *users and applications*. Neither reference would motivate one skilled in the art to have variants that are constant across users and applications. This is because in Alshawi the variants are specifically context related (and thus not global or independent of voice command application). See e.g., paragraph 77 (user chooses an application, and within a context C to customize); paragraph 34 (for each exemplar in context C there may be a collection of variants; the database stores a set of related data of the form C, V, E, wherein each variant is associated with an exemplar E in a context C); paragraph 35 (same). This is analogous to Cohen's teaching that dynamic grammars are defined by users (and as such would be unique to individuals (see Cohen, paragraph 25), and are for specific voice pages and change with time. There is simply no motivation or suggestion in either Alshawi or Cohen to provide for the alias grammar feature as claimed in claim 3.

Accordingly, the obviousness rejection of claim 3 and claims dependent therefrom should be withdrawn.

Claim 9 contains similar subject matter to claim 3 and the rejection should be withdrawn for the same reasons. In particular, claim 9 recites a voice command system with aliasing logic wherein the processor executes the aliasing logic substantially regardless of which voice command application the processor is currently processing. As explained above, the Examiner errs in citing to Cohen for a teaching or suggestion of this subject matter. Neither Cohen nor Alshawi contemplate a voice command system which includes aliasing logic recognizing alias grammar for actual grammar that is applied substantially independently across voice command applications, and in fact theu explicitly suggest just the opposite.

Conclusion

The claims in their current form recite patentable subject matter over the art cited by the Examiner for the reasons stated. The Examiner is requested to withdraw the rejections and pass the case on to issuance. Favorable action to that end is requested.

Respectfully submitted.

McDonnell Boehnen Hulbert & Berghoff LLP

Date: 6/13/05 By: _____

Thomas A. Fairhall
Reg. No. 34591

CERTIFICATE OF MAILING

The undersigned hereby certifies that the foregoing RESPONSE TO MAY 16, 2005 OFFICE ACTION is being deposited as first class mail, postage prepaid, in an envelope addressed to MAIL STOP AMENDMENT, Commissioner for Patents, P.O. Box 1450, Alexandria VA 22313-1450, on this 13 th day of June, 2005.

Thomas A. Fairhall

Thomas A. Fairhall